

ELLYN CLEVINGER
ATTORNEY

February 22, 2022

Honorable Nathan Ochsner
Clerk of Court
USDC, Southern District
Of Texas, Galveston Division
601 Rosenberg Street
Room 411
Galveston, Texas 77550

United States Courts
Southern District of Texas
FILED

FEB 23 2022

Nathan Ochsner, Clerk of Court

RE: *Plaintiffs, Santos Argueta, Blanca Granado, Dora Argueta and Jelldy Argueta, Individually and on behalf of the Estate of Luis Fernando Argueta, v. City of Galveston and Officer Derrick S. Jaradi, Defendants; in the United States District Court for the Southern District of Texas, Galveston Division; Case No. 3:20-cv-367*

**PLAINTIFFS' RESPONSE TO DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT; DOC. 56;
EXHIBITS**

Dear Sir:

Please find enclosed exhibits to Plaintiffs' Response to Defendants' Motion for Summary Judgment (Doc. 56). I have enclosed the paper exhibits, as well as a portable storage device which contains the video exhibits.

When attempting to file the paper exhibits electronically, I experienced protracted technical difficulties (including upload failure; file rejection; time-outs;

1115 Moody Avenue
Galveston, Texas 77550
409.621.6440
ellynclevenger@gmail.com

1100 Poydras Street
Suite 2610
New Orleans, Louisiana 70163

and other errors). Despite several attempts over a several-hour period, I was not able to successfully submit the exhibits for filing.

I contacted the Southern District Clerk's electronic filing department/help desk today, and was instructed to instead submit the paper exhibits for filing. The clerk also instructed that I submit an electronic copy of the exhibits to the Clerk's office. Per your office today, I understand that the video exhibits themselves will not be filed into the record, but that the enclosed electronic copy will be stored in your office with the case record/file.

Accordingly, I am submitting a portable storage device, which contains the following video exhibits to Plaintiffs' Response to Defendants' Motion for Summary Judgment (Doc. 56):

Attachment 25 -

Plaintiffs' video exhibits are noted under corresponding tabs in the enclosed binder, and videos have been copied to the enclosed portable storage drive.

Respectfully,

Ellyn J. Clevenger

Ellyn J. Clevenger

EJC/
files

By Hand Delivery

cc: Norman Giles,
Counsel for Defendants
By USPS priority mail

1115 Moody Avenue
Galveston, Texas 77550
409.621.6440
ellynclevenger@gmail.com

1100 Poydras Street
Suite 2610
New Orleans, Louisiana 70163

Page 2

United States District Court
Southern District of Texas

Case Number: 3:20-cv-367

ATTACHMENT

Description:

- ☐ State Court Record ☐ State Court Record Continued
- ☐ Administrative Record
- ☐ Document continued - Part _____ of _____
- ☐ Exhibit to: _____
number(s) / letter(s) _____

Other: (1) portable storage device - Attachment #25/video

exhibits to DKT 56. Placed in an expandable folder on the

clerk's shelf.